

FILED  
Clerk  
District Court

JAN 11 2008

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

UNITED STATES DISTRICT COURT  
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMIN, MOHAMAD RUHUL,

Defendant.

Criminal Case No. **CR 08 - 00002**

**INDICTMENT**

Title 18, U.S.C. § 371--Conspiracy  
(Ct. 1); Title 18, U.S.C. § 1542--False  
Statement in Application for Passport  
(Ct. 2); Title 18, U.S.C. § 1622 --  
Subornation of Perjury (Ct. 3).

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

**CONSPIRACY TO COMMIT OFFENSE OR TO DEFRAUD UNITED STATES**

**Introduction**

1. On or about August 23, 2007, in the District of the Commonwealth of the Northern Mariana Islands, Mohamad Ruhul AMIN, the defendant, and others known and unknown to the Grand Jury, did unlawfully, wilfully and knowingly, combine, conspire, confederate and agree to intentionally commit an offense against, and to defraud the United States, to wit, to submit an application for a United States passport (Form DS-11) to the federal government, knowing that said application contained false and fraudulent information, in violation of Title 18, United States Code, Sections 1542 and 371.

Participants in the Scheme

2. At all times relevant to this Indictment, defendant Mohamad Ruhul AMIN was a citizen of Bangladesh.
3. At all times relevant to this Indictment, Rose Mayo Reyes (a.k.a. "Rose Mayo Amin") was a citizen of the United States of America.

The Scheme

4. On or about May 9, 2007, defendant AMIN married Rose Mayo Reyes ("Reyes").
5. The purpose of said marriage was to enable AMIN to obtain Immediate Relative status under the immigration laws of Commonwealth of the Northern Mariana Islands.
6. In exchange for the marriage, AMIN provided Reyes with money and gifts worth several hundred dollars.
7. AMIN and Reyes never lived, and never intended to live, together as man and wife.
8. On or before August 23, 2007, AMIN asked Reyes to submit an application for her United States passport (Form DS-11), an application (and resulting U.S. passport) that would identify AMIN as Reyes' spouse.
9. Reyes agreed to submit the Form DS-11.

Overt Acts in Furtherance of the Scheme

10. On August 23, 2007, Reyes submitted a Form DS-11 indicating that she was married to AMIN, replacing her family name with his, to the United States Passport Office located in Susupe, Saipan.
11. When submitting the Form DS-11, Reyes signed and swore under penalty of perjury that the statements contained therein were true and correct.

**COUNT TWO**

**FALSE STATEMENT IN APPLICATION FOR A PASSPORT**

12. The Grand Jury realleges, adopts and incorporates by reference herein, the allegations contained in paragraphs one (1) through eleven (11) as if fully set forth herein.
13. On or about August 23, 2007, in the District of the Commonwealth of the Northern Mariana Islands, Mohamad Ruhul AMIN, the defendant, did knowingly and intentionally make a false statement in an application for a passport with the intent to induce or secure the issuance of a passport under the authority of the United States, to wit, by indicating that he was the spouse of a United States citizen, and by indicating that person's name was "Rose Mayo Amin", in violation of Title 18, United States Code, Sections 1542 and 2.

COUNT THREE

SUBORNATION OF PERJURY

14. The Grand Jury realleges, adopts and incorporates by reference herein, the allegations contained in paragraphs one (1) through thirteen (13) as if fully set forth herein.

15. On or about August 23, 2007, in the District of the Commonwealth of the Northern Mariana Islands, Mohamad Ruhul AMIN, the defendant, did knowingly and intentionally procure another to commit perjury, to wit, by procuring Rose Mayo Reyes to commit perjury when submitting her application for a United States passport, in violation of Title 18, United States Code, Section 1622.

Dated this 11<sup>th</sup> day of January 2008.

A TRUE BILL.



Foreperson

LEONARDO M. RAPADAS  
United States Attorney  
Districts of Guam and NMI

By:



ERIC S. O'MALLEY  
Assistant United States Attorney